

STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY LANSING



April 30, 2007

Ms. Mary Gade, Regional Administrator United States Environmental Protection Agency Region 5 77 West Jackson Boulevard (R-19J) Chicago, Illinois 60604-3590

Dear Ms. Gade:

Enclosed please find Michigan's Environmental Council of the States (ECOS) Regulatory Innovations Agreement, Alternative Permitting Approach for Concentrated Animal Feeding Operations (CAFOs) 2006 Annual Report (ECOS CAFO Project) that provides an update of the implementation activities.

Thank you for your continued support on this project. If you have questions pertaining to the ECOS CAFO Project, please contact Ms. Ronda Wuycheck, Field Operations Division, Water Bureau, at 517-241-7832, or you may contact me.

Sincerely,

Richard A. Powers, Chief

Water Bureau 517-335-4176

Enclosure

cc:

Mr. Mitch Irwin, Director, Michigan Department of Agriculture

Mr. Gordon Wenk, Michigan Department of Agriculture

Ms. Janice Wilford, Michigan Department of Agriculture

Mr. Steven E. Chester, Director, Michigan Department of Environmental Quality

Mr. Stanley F. Pruss, Deputy Director, Michigan Department of Environmental Quality

Mr. Frank J. Baldwin, Michigan Department of Environmental Quality

Michigan Department of Environmental Quality (MDEQ), United States Environmental Protection Agency (USEPA), and Environmental Council of the States (ECOS) Regulatory Innovations Proposal

Alternative Permitting Approach for Concentrated Animal Feeding Operations (CAFOs) Project 2006 Annual Report

April 2007

Overview of Project

The ECOS Regulatory Innovations Proposal, <u>Alternative Permitting Approach for CAFOs Project</u> (ECOS CAFO Project), began in 2002 and is a five-year project demonstrating regulatory innovation of providing an alternative to traditional permitting by offering an option to become verified in the Livestock System of the Michigan Agriculture Environmental Assurance Program (MAEAP). MAEAP is an innovative, proactive program that assists farms of all sizes and commodities to voluntarily prevent or minimize agricultural pollution risks. The MAEAP Livestock System primarily focuses on addressing environmental issues related to livestock activities by implementing conservation practices to protect water and prevent soil erosion based on recommendations found in the Generally Accepted Agricultural and Management Practices (GAAMPS) under the Michigan Right to Farm Act, 1981 PA 93, as amended (RTFA). In essence, the question the ECOS CAFO Project is attempting to answer is if CAFOs verified in the MAEAP Livestock System can provide equal or better environmental protections compared to the CAFOs covered under the National Pollutant Discharge Elimination System (NPDES) CAFO general permit.

The Michigan's NPDES CAFO Permit Program has matured since the beginning of the project, most significantly with the promulgation of the state's CAFO rule in April 2005 followed by the issuance of the MIG019000 general permit in November 2005. The MIG019000 general permit reflects what the MDEQ believes to be standards necessary to protect public health and the environment. The MIG019000 general permit clearly outlines the operating standards for storage structures construction and volume requirements, proper land application practices, standard operation and maintenance programs, inspections, and record keeping that ensures that CAFOs will operate in a sound and responsible manner. The MDEQ believes the MIG019000 general permit is fair and reasonable to the agricultural sector because the standards outlined in the general permit are based on the best available technology (i.e., the Natural Resource Conservation Service [NRCS] technical standards) and the general permit establishes a level playing field for all CAFO owners to know exactly what is expected over a set period of time (i.e., five-year permit cycle). In essence, the agricultural sector is being treated like any other industrial/commercial sector requiring NPDES permit coverage.

Activities accomplished in 2006 primarily focused on implementing the ECOS CAFO Project Assessment Plan developed in October 2005 to evaluate project effectiveness. The Assessment Plan activities included collecting information on the MAEAP Livestock System verification performance standards, tracking how well the CAFOs in the MAEAP option performed voluntarily with project dates, inspecting MAEAP-verified CAFOs to review how they voluntarily stayed in conformance with the MAEAP Livestock System verification performance standards, and identification of similarities and differences between MAEAP-verified CAFOs to

permitted CAFOs. The information collected from the Assessment Plan provided the Water Bureau (WB) with insights into the methods and standards by which farms are verified. The complete results from the Assessment Plan will be reported in the Final Report for the ECOS CAFO Project. The 2006 Annual Report includes activities accomplished during the reporting period of January 1, 2006, until December 31, 2006.

2006 Implementation Activities

The following activities were accomplished during this reporting period:

- N/A new letters of intent (LOI) received
- 50 CAFOs verified in MAEAP Livestock System
- 5 certificates of coverage and 4 individual permits issued
- 35 inspections conducted at MAEAP-verified CAFOs

In accordance with the ECOS CAFO Project, all CAFOs were to be MAEAP-verified in the Livestock System by September 1, 2006. As of that date, 113 CAFOs were successfully MAEAP-verified while 15 CAFOs were not able to make the September 1, 2006, deadline. Of the total remaining 113 CAFOs in the project, 54 CAFOs were verified in compliance with the 12-month time frame to be verified while 59 CAFOs went past their given time frame, including the 15 that did not get MAEAP-verified. The 15 CAFOs that did not make the September 1, 2006, deadline were directed to apply for permit coverage because they did not get verified as intended.

Two MAEAP-verified CAFOs illegally discharged during this reporting period, which required the operators to apply for permit coverage. One of the operations discharged as a result of inadequate animal waste management practices resulting in an overflow from the storage structure and, additionally, discharges from land applications as attempts were made to lower the storage levels. The other operation discharged as a result of an accidental spill during a transfer to a land application site causing the animal waste to be discharged to waters of the state.

Regarding the Assessment Plan, the Michigan Department of Agriculture (MDA) provided the completed MAEAP Verification Evaluation in which the MDA outlined what is considered to be performance standards for determining adequate storage for new and existing structures; proper operation and maintenance of storage structures; identified conservation practices for the production and land application areas; identified practices for the diversion of clean water from the production area; identified practices to prevent direct contact of confined animals to waters of the state; determined proper mortality management; determined proper chemical disposal; identified appropriate storm water management practices; proper land application practices; and proper record keeping.

One of the differences identified from the review of the MAEAP Verification Evaluation between the MAEAP Livestock System verification performance standards to that of the permit requirements for CAFOs is that the MAEAP Livestock System does not require all CAFO production area wastewater to be collected and stored. Specifically, MAEAP Livestock System verification performance standards do not require that silage pad contaminated runoff be collected, rather the standards evaluate the site on a case-by-case basis to determine if the installed conservation practices manage the contaminated runoff in a manner that prevents or minimizes discharges to waters of the state. In contrast, the MIG019000 general permit requires that all CAFO production area wastewater is collected and stored in storage structures

built in accordance with NRCS technical standards or, where applicable, the contaminated runoff can be handled in accordance with the Wastewater Strip Standard NRCS Technical Standard developed specifically for Michigan.

An example of a similarity between the MAEAP Livestock System performance standards and permit requirements is the sampling protocol for animal waste and soils, which are virtually the same in both programs. The MIG019000 general permit does provide clarity to each of these sampling protocols by putting the exact requirements within the permit where the MAEAP performance standards simply reference specific bulletins without giving a specific date of the specific bulletins. This could lead to confusion if a bulletin is updated in the future. The entire evaluation of MAEAP Verification Evaluation will be compiled and reported in the Final Report for the ECOS CAFO Project.

The MDEQ also completed its inspections at the MAEAP-verified CAFOs with a total of 48 (35 in 2006 and 13 in 2005). The inspections were completed to review how the MAEAP-verified CAFOs voluntarily implemented their MAEAP performance standards. After the initial set of inspections, it was quickly discovered that the MAEAP-verified CAFOs all have very specific case-by-case scenarios making it difficult to make clear distinctions between the voluntary and regulatory requirements. So at the very end of 2005, the inspection checklist was changed to eliminate the open-end style questions to the basic "yes, no, or N/A" style questions. The driver for this format change, again, was based on the ability to make clear comparisons between the MAEAP performance standards to that of general permit requirements. For example, as outlined in the MAEAP Verification Evaluation, MAEAP Livestock System verifications do not have one set performance standard for collection of silage pad contaminated runoff. Typically what was found at the MAEAP-verified CAFOs was for the silage pad contaminated runoff to be allowed to flow off onto filter strips, vegetative-grassy areas, or nearby fields. It appeared the test for determining if these conservation practices were working is if the grassy area taking the contaminated runoff showed any visual signs of erosion or burned out vegetation indicating high levels of toxicity from the contaminated runoff destroying the vegetation. This performance standard would not be allowed in the MIG019000 general permit because of concerns with discharges to groundwater and surface waters with the lack of following appropriate NRCS technical standards.

Another identified difference is that the MAEAP allows for CAFOs to be verified with a schedule of implementation for corrective actions to be put into place sometime in the future. Corrective actions can be as minor as installing fencing around the storage structure for safety reasons to a major correction of installing storage structures if the operation did not have adequate storage at the time of verification. This schedule of implementation can be adjusted at any time by the CAFO owner without notice to or approval given by the MDA. In contrast, the NPDES permitting system can accommodate future compliance schedules; however, they are written into the general permit certificate of coverage as a compliance date that then becomes part of the permit requirements. Failure to meet permit requirements constitutes a permit violation. The entire evaluation of MAEAP inspection findings will be compiled and reported in the Final Report for the ECOS CAFO Project.

Barriers to Project Success

As reported in the 2005 Annual Report, a large number of CAFOs (77) waited until the September 1, 2005, deadline to submit their LOI to become MAEAP-verified in the Livestock System instead of applying for permit coverage. Based on the knowledge that the average time to get MAEAP-verified takes 1.3 years as reported in survey reports provided by the master

thesis "Financial Costs and Environmental Outcomes of the MAEAP," by Ms. Carrie Vollmer-Sanders, Michigan State University, Department of Agricultural Economics, November 2005, it comes at no surprise that the 77 remaining CAFOs hit a few roadblocks to reach their goal. To the credit of the MDA, a lot of extra work effort went into accommodating the last minute requests to get MDA verifications by redirecting staff time, allowing for overtime, and weekend hours to verify CAFOs in time. The following table shows how much work effort was needed to verify 50 CAFOs in 2006.

Month and Year Verified	Number of Operations Verified					
July 2006	8					
May 2006	1					
June 2006	2					
July 2006	7					
August 2006	32					

Regarding the 15 CAFOs that did not make the September 1, 2006, deadline to become MAEAP-verified, the reasons for not getting MAEAP-verified included 1 that had an open MDEQ, Air Quality Division, enforcement case pending; 1 had an open Right to Farm complaint pending; 5 had inadequate land base; 4 simply did not plan well; 1 could not meet the existing components evaluation; 1 had inadequate storm water containment; and 2 are no longer considered large CAFOs.

The MDEQ also needed to direct a significant amount of staff time in 2006 to inspect the 48 MAEAP-verified CAFOs, conduct assessment reviews, and track project progress mainly due to the previously unknown amount of flexibility and variation from farm to farm of what is allowable within MAEAP verifications. This makes the assessment review much more complicated. Of great concern is the recognition that the minimum standards for MAEAP livestock verifications are based on the GAAMPs. The WB has taken the position with regard to the Right to Farm GAAMPs that a determination of conformance with any particular GAAMP made by the MDA is not a determination of compliance with the applicable requirements of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, or any rules promulgated thereunder. GAAMPs, in essence, establish recommendations for farms to follow to lessen nuisance complaints; however, they do not provide any assurances for environmental protection equal to the MIG019000 general permit. In fact, the WB has provided input on the GAAMPs identifying several practices that likely would result or contribute to groundwater or surface discharges. The MDEQ will continue to evaluate the gaps, similarities, and differences such as these and provide a comprehensive review of the ECOS CAFO Project along with recommendations in the Final Report.

Project Contact
Ronda Wuycheck
Assistant to the Field Operations Division Chief
Water Bureau
Michigan Department of Environmental Quality
517-241-7832

ECOS Agreement MAEAP Option 2006

									e province a series as services	
Facility Name	Owner .	Facility Address	County	Distr	ict ive inspec	ti. EAP inspi	MAEAP Verification	DueDate MAEAP Ver	fiedzified	
112th Street	Harold Walcott	11306 Polk, Holland	Ottawa	GR	5/7/2003	12/5/2005	10/1/2004	11/2/2004	Al	
Active Feed Company	Joseph J. Maust	6761 Haist, Pigeon 48755	Huron	SB	12/8/2004	5/10/2006	8/5/2004	11/10/2004	N N	
dam Farms	Larry Adam	3665 Gettel Road, Sebewaing 48759	Huron	SB	9/30/2004	5/15/2006	4/1/2005	9/30/2004	- 	
Aguila Farms	John Verhaar	3201 W. Soper Road, Bad Axe 48413	Huron	SB	- G, GG, EGG .	9/9/2005	8/4/2005	5/27/2004	- ; -	
Autumn Vista Dairv	Chad Gernaat	1060 W. Stoney Corners Road,	Missaukee	CAD		0/0/2000	9/2/2005	6/13/2006	N	
3 P Pork LLC	Brian Pridgeon	1115 Pridgeon Road, Montgomery 49255	Hillsdale	JXN		5/22/2006	9/1/2006	8/24/2005	Y Y	
	Rodney Baker	64020 Powers Road, Sturgis 49091	St. Joseph	KAL	7/14/2004	3/22/2000	11/15/2005	NOT VERIFIED	- IN	
Baker Hog Farm	Jeff & Ernie Bebow	9119 N. Baldwin Road, St. Louis 48880	Gratiot	LAN	1714/2004	-	4/1/2005	NOT VERIFIED		
Bebow Dairy Farms, Inc		24 Mile Road, Albion	Calhoun	KAL					N	
Blight Farms Inc.	Ken Blight						5/4/2006	6/9/2005	Y	
Boehs Farm	Regal Boehs	4990 Hayes Road, Middleton 48856	Gratiot	LAN			9/1/2006	7/25/2006	Y	
Boersen Farms	Arland Boersen	6241 Ransom Street,	Ottawa	GR	- 		9/1/2006	8/24/2006	N	
Briggs Farms	Gordon A, and Gordon V. Briggs	455 N. Tuttle Road, Scottville 49454	Mason	CAD			9/1/2006	8/31/2006	Y	
Broad Farms, LLC	Russell L. Broad	8110 W. 4 Road, Mesick 49668	Wexford	CAD			9/1/2006	8/29/2006	ΙY	
& M Hog Farms	Craig Jipping	4351 140th, Hamilton	Allegan	KAL		<u>.l</u>	9/1/2006	NOT VERIFIED	N	
Cary Dairy Farm, Inc.	Stephen P. Cary	6625 Poorman Road, Battle Creek 49017	Calhoun	KAL			4/1/2005	NOT VERIFIED	N	
Cary Pioneer Farms, Inc.	Scott, Matthew, and Jason Cary	3977 North Bliss Rd., Alma 48801	Gratiot	LAN			9/1/2006	8/28/2006	Y	
hurchill Finishers	Randy Cuthbert	54501 Griffis Road, Cassopolis 49031 (mail)	Cass	KAL		1	8/29/2006	3/6/2006	Y	
Circle K Family Farms, LLC	Bob Johnson, Dennis Beasley, Kris Duflo	9517 E. McKenna Road, Hubbardston 48845	Ionia	GR	12/14/2004	6/8/2006	6/2/2004	6/1/2004	Y	
lover Family Farms	J.P. Clover	2412 N. Stage Road, Ionia 48846	Ionia	GR		1	5/4/2006	8/22/2006	N	
onklin Farm/Kruithoff Farms, LLC	Tim Kruithoff	4403 Gooding Road, Conklin 49403	Ottawa	GR	-		9/1/2006	8/14/2006	l _N	
ourter Farm	William Courter	10095 N. Luce Road, Alma 48801	Gratiot	LAN	3/2/2004		6/2/2005	NOT VERIFIED	N	
rockery Creek Turkey Farms-Maple Island	Harley Sietsma	9495 W. 74th, Fremont 49412	Newaygo	GR	6/9/2004	5/25/2006	6/2/2004	4/22/2004	TY Y	
	Timothy den Dulk	86 141st Street, Wayland 49348	Allegan	KAL	10/3/2004	5/25/2000	4/7/2006	10/12/2005	Y	
rossroads Dairy LLC	Thomas J. and Richard P. Oomen	6503 S. Stiles, Pentwater 49449	Mason	CAD	-	6/27/2006	2/2/2005	7/27/2005	N N	
rystal Valley Farms		67480 Hebron Road, White Pigeon 49099	St. Joseph	KAL	-	0/2/1/2000				
avis Farms	Terry Davis			LAN	40470000	144 700 1000 5	8/4/2005	2/1/2006	N	
eSaegher Dairy, Inc.	Bart De Saegher	8068 W. Buchanan Road, Middleton 48856	Gratiot		12/17/2003	11/22/2005	6/2/2004	4/23/2003	Y	
eWeerdt Poultry	Vern DeWeerdt	4980 140th Avenue, Holland 49423	Allegan	KAL	10/24/2003	6/20/2006	4/1/2005	1/18/2005	· Y	
ouble Eagle Dairy, Inc.	John Weller	5742 South Pendell Road, Middleton 48856	Gratiot	LAN	12/7/2004		10/1/2004	7/14/2006	N	
lykhuis Farms River bend	Bob Dykhuis	1500 84th Avenue, Zeeland 49464	Allegan	KAL,	5/1/92004		8/4/2005	9/8/2005	N	
ykhuis Farms Village Central Farms	Bob Dykhuis	4252 48th Street, Holland 49423	Allegan	KAL	5/1/92004	L	8/4/2005	9/8/2005	N	
dward and Kelly Reed Hog Finishers (Fox Road	Edward and Kelly Reed	19500 Fox Road, Cassopolis 49031	Cass	KAL			9/1/2006	8/31/2006	Υ	
illmore Turkey Farms	Harold Walcott	16304 Fillmore, West Olive 49460	Ottawa	GR	5/7/2003	12/5/2005	10/1/2004	11/2/2004	N	
our D Farms LLC	Kris Dufto	7920 S. Osborn, Carson City 48811	Gratiot	LAN	12/12/2003	6/2/2006	3/27/2003	3/27/2003	Y	
ritz Farms (John W. Fritz Family Trust)	Ben Fritz	14000 South 40th Street, Vicksburg	Kalamazoo	KAL			9/1/2006	8/17/2006	Y	
allagher	Gary Gallagher	1221 Osbourne Road, Sumner 48889	Gratiot	LAN	11/5/2003	i	4/1/2005	NOT VERIFIED	N	
ernaat Family Farms	Brad Gernaat	11800 South Hockwater Road, Marion 49665	Osceoia	CAD			9/1/2006	10/12/2005	Y	
oma Dairy Farm	Geert and Gertie Vandengoor	3981 Aitken Road, Marlette 48453	Sanilac	SB			5/4/2006	Jul-06	N	
reen Meadows Farms	Merle H. Green	6400 N. Hollister Road, Elsie 48831	Clinton	LAN	1	 	8/5/2004	9/22/2004	N	
	Henk and Dina Knevelbaard	3896 S. Fitzgerald, Fremont 49412	Newaygo	GR	9/29/2004		6/16/2004	8/4/2006	N	
& D Dairy	Robp Vander Zwaag	4081 134th Avenue, Hamilton 49419	Allegan	KAL	312312004		9/1/2006	6/20/2006	14	
amilton Pullets LLC		4438 140th Avenue, Holland 49423	Allegan	KAL.		6/15/2006			Y	
arvest Hill	Ronald Klein				In (no longo :		2/15/2006	3/29/2005	Υ	
ass Feedlot #1	Albert, Dan & Jim Hass	775 Carpenter Road, Bad Axe 48413	Huron	SB	8/22/2003	5/23/2006	10/1/2004	8/19/2005	N	
ass Feedlot #2	James C. Hass	2258 Thomas Road, Bad Axe 48413	Huron	SB	10/19/2004	5/23/2006	11/15/2005	3/28/2005	Υ	
einze Farms	Greg Heinze	8568 N. Holland Road, Six Lakes 48886	Montcalm	GR	I		9/1/2006	8/25/2006	Υ	
erbruck Poultry Ranch, Inc.	Stephen Herbruck	6425 West Grand River, Saranac 48881	lonia	GR	11/12/2004	5/31/2006	9/4/2004	9/28/2004	N	
erbruck's Chickery	Stephen Herbruck	6595 S. State Road, Ionia 48846	ionia	GR	11/12/2004	5/31/2006	9/4/2004	9/28/2004	N	
erbruck's Hennery	Stephen Herbruck	478 Portland Road, Lake Odessa 48849	Ionia	GR	11/12/2004	5/31/2006	9/4/2004	9/28/2004	N	
gh Lean Pork	Harley Sietsma	1652 11 Mile Road, Remus 49340	Mecosta	GR			6/2/2004	8/25/2006	N	
lls Turkey Farm	Harold Walcott	8660 136th, West Olive 49460	Ottawa	GR	5/7/2003	12/5/2005	10/1/2004	11/2/2004	N	
Ilsdale Farm-Overisel Hog Barns	Mike Geerlings	4195 142nd Street, Hamilton 49419		KAL	9/14/2004		9/2/2004	NOT VERIFIED	N	
lisdale-Riverton Hog Barns	Mike Geerlings	3430 Stiles Rd., Scottville 49454	Mason	CAD	7/12/2004	-	9/2/2004	NOT VERIFIED	N	
liside Farm-Custer Hog Barn	Mike Geerlings	900 Schooner Rd., Branch 49402	Mason	CAD	7/12/2004		9/2/2004	NOT VERIFIED	N	
nz Farms LLC	Robert and Charles Hinz	64233 Baseline Road, South Haven 49090		KAL			9/1/2006	8/30/2006	Ÿ	
ogquest Farms LLC	Jim DeWitt and Craig Jipping	5221 136th Street, Hamilton	Allegan	KAL	1		9/1/2006	NOT VERIFIED	N	
ogquest Farms LLC	Steve Hooks	6650 North Wisner, Breckenridge 48615		LAN	 	•	9/1/2006	8/29/2006	\ \\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	
	Tim and Kathy Howell	1980 N. Bradlewille Road, Fairgrove 48733		SB	 		5/23/2006	5/19/03*** verified prior	IT CATO	
owell Farms		4780 Lowe Road, Byron Center 49315		GR						
dian Trail Farm	Wendell & Diane Loew, Gale & Mildred Loew				0.000,000.0	210010000	9/2/2005	8/17/2006	N	
gelside Farms	Rick, Brett, Jermy, Todd Schapman	8891 36 Mile Road, Romeo 48065	Macomb	SE MI	9/23/2004	6/28/2006	9/23/2004	9/23/2004	lv	

ECOS Agreement MAEAP Option 2006

			SHEET CALLS	400000						
Facility Name	Owner	Facility Address	County	Distric	t ive inspect	FAP Inshe	MAEAP Verification E	ue Date MAEAP Veri	fiedvified	
	L WILL	A-4253 40th Street, Holland 49423	Allegan	KAL			9/1/2008	NOT VERIFIED	N	
eff Hoeue Farms	Jeff Hoeue Dayld, Dennis, Edward Johnson	W4697 25 Road, Dangett 49821	Menominee	UP	····		9/1/2006	NOT VERIFIED	N	
ohnson Farms, LLC		8287 S. Warner, Fremont 49412	Newaygo	GR.	12/8/2003	12/19/2005	5/22/2004	8/15/2002	Ϋ́	
arnemaat's LLC	Kent Karnemaat	5124 138th Ave., Holland 49423	Allegan	KAL	112/0/2000	1.2	9/1/2006	8/26/2006	Ϋ́	
(leinheksel Farms	John Kleinheksel	2975 9 Mile Road, Sparta 49345	Kent	GR	+		11/15/2005	9/16/2005	Ý	
Cober Farms, Inc.	Brad Kober	3675 58th Street, Hamilton 49419	Allegan	KAL	1		9/1/2006	8/28/2006	N	
Koeman - Contract Finishers	Paul A. and Judith L. Koeman	1240 Eighth Street, Martin 49070	Allegan	KAL	10/6/2003	i	12/1/2004	8/1/2006	N	
(onos Inc. (Vande Bunte Eggs)	David Vande Bunte	2612 Chickering Road, Belding 48809	Ionia	GR	10/0/2003	- 	5/4/2006	8/4/2006	N N	
Krieger Farm	Raymond Krieger		Ottawa	GR	5/7/2003	 	10/1/2004	11/2/2004	N	
and of Turkey Farm	Harold Walcott	13581 Stanton St. West Olive 49460	Ottawa	GR	11/5/2004	1	9/2/2004	11/17/2005	N	
angeland Farms	Marlin and Merle Langeland	5085 Garfield, Coopersville 49404	Midland	SB	11/5/2004	7/18/2006	9/2/2004	5/9/2005	N N	
eVar Farms, LLC	Jerry Vamer	4103 N. Dublin Road, Midland 48642	Berrien	KAL		771672000	9/1/2006	3/27/2006	V V	
one Hickory Hogs LLC	Tim and Kevin Sherrill	17142 S. Avery Road, Three Oaks 49128		SB	 	-	8/5/2004	8/30/2006	N	
Nackinac Land and Cattle Co	Robert J. Rosenaw	8805 W. Meadow Road, Whitemore	losco		12/19/2003	12/15/2005		10/18/2002	 \ \	
laple Row Dairy	Jim and John Hardy	113 Lee Road, Saranac 48881	lonia	GR	12/19/2003	12/15/2005	10/18/2002		ΙΥ	
faplewood Farrowing	Randy Cuthbert	54501 Griffis Road, Cassopolis 49031 (mail)	Cass	KAL	0.000000	ļ	8/29/2006	3/6/2006	N N	
Masselink Dairy and Cherry Valley Dairy	Roger Masselink	10718 Green Lake Road, Middleville 49333	Barry	GR	9/9/2003		2/2/2005	8/31/2006		
IcKenzie Highlands	Keith and Brian McKenzie	17645 McKenzie Street, Cassopolis 49031	Cass	KAL			9/1/2006	8/31/2006	N	
AcKenzie Reed Farm LLC	Edward and Kelly Reed	55150 Miller Road, Marcellus 49067	Cass	KAL	J	<u> </u>	9/1/2006	8/31/2006	Y	
leadow Rock Dairy, LLC	Robert den Duik	7691 Russell Road, Greenville	Montcalm	GR	8/25/2004	5/24/2006	9/2/2004	10/13/2004	N	
lihills Farms	Norm Mihills	60770 Patterson Hill Road, Jones 49061	Cass	KAL,		,	9/1/2006	3/2/2006	ΙY	
luxlow Stock Farm, Inc.	Gary Muxlow	8187 Peck Road, Marlette 48453	Sanilac	SB		11/29/2005	5/5/2005	8/17/2004	Y	
I & N Hog Farm	Nick Young	2501 E. Galien-Buchanan Road, Buchanan 49117	Berrien	KAL	9/17/2004	6/8/2006	8/5/2004	9/17/2004	N	
eyer Farms Inc.	Bryand and Jerry Neyer	10200 South Wise Road, St. Louis 48880	Isabella	SB	<u> </u>	<u> </u>	8/29/2006	8/31/2006	N	
obis Dairy Farms	Larry and Ken Nobis	5813 W. Walker Road, St. Johns 48879	Clinton	LAN	10/20/2004	6/27/2006	6/14/2004	11/1/2004	N	
VF, Inc.	Martin, Neal, Kelly, and Harold Travis	11691 East Walton Road, Shepard 48883	Isabella	SB			9/1/2006	8/28/2006	Υ	
.H.H. Pork	Alan Oomen, Thad Helmlinger, Aaron Hacker	6558 S. Custer Road, Custer 49405	Mason	CAD		6/27/2006	2/2/2005	7/28/2005	N	
oil Farms Inc.	Gord, Randy, and Greg Poll	4406 134th, Hamilton 49419	Allegan	KAL		T	9/2/2004	1/31/2006	N	
oil Farms Inc Holland	Randy Poli	52nd Street, Holland, MI 49423	Allegan	KAL			2/2/2005	1/31/2006	N	
Port Sheldon Turkey Farm	Harold Walcott	11591 Port Sheldon, Holland 49424	Ottawa	GR	5/7/2003	12/5/2005	10/1/2004	11/2/2004	N	
	Keith and Brad Blonde	10246 Cronk Road, Litchfield 49452	Hiilsdale	JXN .	.i		2/8/2005	8/27/2002	Y	
recision Pork LLC	Dennis and Julie Russcher	5014 Perry Street, Zeeland 49464	Ottawa	GR			9/1/2006	7/31/2006	Υ	
recision Pork LLC	Doug and Phil Russcher	5136 146th Avenue, Holland 49423	Allegan	KAL			9/1/2006	8/15/2006	Υ	
referred Hog Farms	Keith, Glen & Brian Preston	1097 Central Road, Quincy 49082	Branch	KAL	10/29/2003		9/2/2006	8/30/2006	Ý	
reston and Son Farms	William and Michael Pridgeon	1115 Pridgeon Road, Montgomery 49255	Branch	KAL	8/25/2004	5/22/2006	9/2/2004	8/24/2005	N	
ridgeon Farms		2080 Grindstone Road, Port Austin	Huron	SB	O/LO/LDD /	0/12/2000	5/4/2006	8/30/2006	Y	
athmourne Dairy	Brian Ingram	4877 Moeller Road, Port Hope 48468	Huron	SB			5/4/2006	8/30/2006	N	
athmourne Dairy #2 (Old Iseler Dairy)	Brian Ingram	8055 Seneca Hwy., Morenci 49256	Lenawee	JXN	4/21/2004		6/2/2005	4/19/2006	N	
aymond and Stutzman Farm	David & Tim Stutzman Farm		Cass	KAL	4/21/2004		9/1/2006	NOT VERIFIED	N	
aymond McKenzie	Raymond McKenzie	56926 Sauage Road, Marcellus 49067	Вапу	GR			5/4/2006	7/10/2006	N	
liedstra Dairy	Al Riedstra	12850 Parker Road, Delton 49046	Allegan	KAL			9/2/2004	8/29/2004	N	
olling Acres Dairy Farm	Arlyn Coffey	2748 30th Street, Allegan 49010	Huron	SB	8/10/2004	5/15/2006	6/2/2004	6/23/2005	N	
& M Dairy	Steven Schulte	9175 Toppin Road, Harbor Beach 48441		KAL	8/10/2004	9/7/2005	12/1/2004	11/17/2004	Y	
chipper Poultry	Cal Schipper	4852 142nd Avenue, Holland49423	Allegan		7145/0000	6/29/2006	9/4/2004	11/4/2003	Y	
choolcraft Egg	Patrick Hunter	14981 18th Street, Vicksburg 49097		KAL.	7/15/2003				1	
churing Farms LLC	Gene, Jodi, Virginia Schuring	3537 North Hayes Road, Muir 48860	Ionia	GR		6/1/2006	11/15/2005	8/19/2005	Y	
cott McKenzie Farm	Scott and Andrea McKenzie	12019 Pioneer Street, Marcellus 49067	Cass	KAL			9/1/2006	8/22/2006	Y	
eldom Rest Farms	Chuck Brink	A-4098 146th Avenue, Holland 49423		KAL	F// 10055		7/2/2004	8/15/2006	N	
hamrock Farm, Dykhuis Farms Inc.	Robert and Lorrie Dykhuis	111888 42th Street, Fulton 49052	Kalamazoo	KAL	5/1/92004		8/4/2005	7/7/2006	N	
mith and Son Hogs	Tim and Jill Smith	12515 S. 10th Street, Schoolcraft 49087	Kalamazoo	KAL	7/23/2004		2/15/2006	NOT VERIFIED	N	
ate Line Farms	Gary Gallup	11387 M-156, Morenci 49256	Lenawee	JXN	10/20/2003		4/1/2005	NOT VERIFIED	N	
eenblik Dairy Inc.	Al Steenblik	3844 N. Hubbardston Road, Pewamo 48873	Ciinton	LAN	12/9/2003	5/12/2006	2/2/2005	1/13/2005	Υ	
oneman Farms	William, Timothy, David, John Stoneman	6387 N. McClelland Road, Breckenride 48615	Gratiot	LAN	<u> </u>		8/29/2006	8/28/2006	Υ	
orey Farms LLC	Michael and Gregory Storey	1650 6 Mile Road, Remus	Mecosta	GR			9/1/2006	NOT VERIFIED	N	
iburban Farms, Inc.	John and Karen LaRosa	8455 E. Schaeffer Road, Muir 48868		GR		5/12/2006	8/5/2004	10/8/2004	N	
unrise Acres Egg Farm	Richard and William Patmos	1180 32nd Avenue, Hudsonville 49426	Ottawa	GR		5/17/2006	6/2/2004	8/27/2004	N	
unrise Acres Egg Farm	Richard and William Patmos	2558 32nd Avenue, Hudsonville 49426	Ottawa	GR	6/10/2004	5/17/2006	6/2/2004	8/27/2004	N	
	Richard and William Patmos	2929 Byron Road, Hudsonville 49426	Ottawa	GR	6/10/2004	5/17/2006	6/2/2004	8/27/2004	N	
unrise Acres Egg Farm numb Swine Enterprises	Ralph and Paul Swartzendruber	9744 Geiger Road, Bay Port 48720		SB	į,	6/14/2006	6/2/2004	3/15/2004	Υ	
nema aware emerorises	Litable and Later Office College and	7591 Abbott Road, Reading 49274		JXN	9/29/2004		12/16/2005	7/12/2006	N	

ECOS Agreement MAEAP Option 2006

		Facility Address	County	District	ve inspecti		MAEAP-Verification Du	eDate MAEAP Verified	irified an
Facility Name	Owner	14998 Taylor, West Olive 44460	Ottawa	GR	5/7/2003	12/5/2005	10/1/2004	11/2/2004	N
urkey Town	Harold Walcott	10286 Maple Island Road, Walkerville 49459	Newaygo	GR		4/18/2006	6/2/2004	12/8/2003	Y
alley View Pork	Jim Speer Russell Walcott	7495 Lake Michigan Drive, Allendale 49401	Ottawa	GR	10/26/2004	12/12/2005	6/16/2004	10/26/2004	N V
alley View Poultry ralley View Poultry-Rector Rd Organic Farm	Russell Walcott	1454 Rector Road, Ionia 48846	Ionia	GR	8/23/2004	6/7/2006	6/16/2004 9/2/2005	6/16/2004 12/7/2005	N.
/alley View Poultry-Rector Rd Organic's arm	Paul Van Hoosear	355 Stringtown Road, Quincy 49082	Branch	KAL GR		-	9/1/2006	5/31/2006	Y
/eld Farm - Contract Finishers	Rubeit A. Volu	3750 14th Street, Wayland 49348 1557 North Elkton Rd., Elkton, MI 48731	Barry Huron	SB		1	9/1/2006	8/29/2006	Υ
V A: Herford and Sons	Bill alla dilli Fierrora	4100 E. Ridge Road, Elsie 48831	Clinton	LAN	1,747	5/12/2006	9/4/2004	12/21/2004	N
Vensier Adde Dali y		10286 Maple Island Road, Walkerville 49459	Oceana	GR	1	4/18/2006	12/1/2004	7/28/2005	N
Villiams Grow Finish Farm	Jeff Taylor	305 E. Roosevelt Road, Ashley 48806	Gratiot	LAN	11/12/2004	9/27/2005	9/4/2004	10/1/2005 7/8/2004	N.
Villow Creek Farms Vinkel Dairy LLC	Harvey, Jack, and James Winkel	1910 E. Meyering Road, Marion 49665	Missaukee Aljegan	CAD KAL	· — —	6/12/2006	1/26/2005	1/18/2005	Υ
Coet Poultry, Inc.	John Zoet	4847 140th Avenue, Holland 49423 3944 M-40, Holland 49423	Allegan	KAL,	<u> </u>	6/12/2006		1/18/2005	Υ
	I John Zoet	13944 M-40. Holianu 43443	1. 0.49-01	1		<u> </u>			